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*Counsel for the Tesla Investor Group and
Proposed Co-Lead Counsel for the Class*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

KALMAN ISAACS, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

ELON MUSK and TESLA, INC,

Defendants.

Case No. 3:18-cv-04865-EMC

CLASS ACTION

**DECLARATION OF JAMES M.
WAGSTAFFE IN FURTHER SUPPORT
OF MOTION OF THE TESLA
INVESTOR GROUP FOR
CONSOLIDATION, APPOINTMENT AS
LEAD PLAINTIFF AND APPROVAL OF
SELECTION OF COUNSEL**

Date: November 15, 2018
Time: 1:30 p.m.
Courtroom: 5 – 17th Floor
Judge: Hon. Edward M. Chen

(caption continues on the following pages)

1 WILLIAM CHAMBERLAIN, Individually
2 and on Behalf of All Others Similarly Situated,

3 Plaintiff,

4 v.

5 TESLA INC., and ELON MUSK,

6 Defendants.

Case No. 3:18-cv-04876-EMC

7 JOHN YEAGER, Individually and on Behalf
8 of All Others Similarly Situated,

9 Plaintiff,

10 v.

11 TESLA, INC. and ELON MUSK,

12 Defendants.

Case No. 3:18-cv-04912-EMC

13 CARLOS MAIA, Individually and on Behalf
14 of All Others Similarly Situated,

15 Plaintiff,

16 v.

17 TESLA, INC. and ELON R. MUSK,

18 Defendants.

Case No. 3:18-cv-04939-EMC

19 KEWAL DUA, Individually and on Behalf of
20 All Others Similarly Situated,

21 Plaintiff,

22 v.

23 TESLA, INC. and ELON MUSK,

24 Defendants.

Case No. 3:18-cv-04948-EMC

25 *(caption continues on the following page)*
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JOSHUA HORWITZ, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

TESLA INC., and ELON R. MUSK,

Defendants.

Case No. 3:18-cv-05258-EMC

ANDREW E. LEFT, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

TESLA INC., and ELON R. MUSK,

Defendants.

Case No. 3:18-cv-05463-EMC

ZHI XING FAN, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

TESLA INC., and ELON R. MUSK,

Defendants.

Case No. 4:18-cv-05470-EMC

SHAHRAM SODEIFI, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

TESLA, INC., a Delaware corporation, and
ELON R. MUSK, an individual,

Defendants.

Case No. 3:18-cv-05899-EMC

1 I, James M. Wagstaffe, declare as follows:

2 I am a member in good standing of the bar of the State of California and am admitted to
3 practice before this Court. I am a partner at Kerr & Wagstaffe LLP, proposed Liaison Counsel
4 for the Class. I submit this declaration in further support of the motion filed by Andrew E. Left,
5 PROtecto Informatikai Szolgáltató Korlátolt Felelősségű Társaság, Thierry Boutin, Dr. Abrar
6 Shirazi, and Vilas Capital Management, LLC (“Vilas Capital”) (collectively, the “Tesla Investor
7 Group”). See ECF No. 47.

8 Attached as Exhibits A through B are true and correct copies of the following documents:

9 EXHIBIT A: Supplemental Joint Declaration of the Tesla Investor Group; and

10 EXHIBIT B: Supplemental Declaration of Robert M. Daines;

11 I hereby declare under penalty of perjury that the foregoing is true and correct.

12 Executed this 30th day of October, 2018, at San Francisco, California.

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14 /s/ James M. Wagstaffe
15 James M. Wagstaffe
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